

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Federal Insurance Co, et al. v. Al Qaida, et al., No. 03-CV-6978
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al, No. 04-CV-1923
Euro Brokers Inc., et al., v. Al Baraka, et al., Case No. 04 Civ. 7279

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT, WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI
ARABIA AND WORLD ASSEMBLY OF MUSLIM YOUTH INTERNATIONALS'
MOTION FOR RECONSIDERATION OF SECTION IV OF THE COURT'S OPINION
AND ORDER COMPELLING DISCOVERY DATED AUGUST 29, 2018**

Jerry S. Goldman affirms under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am an attorney admitted to practice in this Court and a Shareholder of the law firm Anderson Kill. I am a member of the Plaintiffs' Executive Committees that have been formed in these 9/11 matters. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Memorandum of Law in Opposition to Defendant World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International's Motion for Reconsideration of Section IV of the Court's Decision and Order (ECF Nos. 4164-4169) (September 12, 2018).

2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the February 19, 2014 Hearing before Judge Maas.

3. Attached hereto as Exhibit 2 is a true and correct copy of transcript of the November 16, 2011 Hearing before Judge Maas.

Executed in New York, New York on October 10, 2018.

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.